

Appl. No. 10/787,485

Reply to Final Office Action of October 19, 2005

### REMARKS

Reconsideration of this application is respectfully requested.

The Action rejected Claims 1-23 under 35 U.S.C. § 103(a) as being unpatentable over Peiter (EP 1202325) in view of FIG. 3 of Applicant's disclosed prior art. This rejection is respectfully traversed.

Peiter discloses an interbay rail track 10 and an intrabay rail track 20. The interbay rail track 10 reaches into the bay area, thereby passing each of the processing machines. The intrabay rail track 20 is **mounted along** the interbay rail track 10 **within** the bay area to lift up or lower the wafer carrier 1 on the load port 31, lines 25-32, Col. 2.

Claims 1, 10 and 15 have been amended to recite that "the first material transport subsystem transfers material within a production bay and **between at least two production bays**, and the second material transportation subsystem transfers material between the at least two production bays." In the example of FIG. 4, the first material transport subsystem 409 with the lower rail section 408 provides material transfer within the production bay 408. The first material transport subsystem 409 with the lower rail section provides material transfer between the production bays 402. The first material transport system 409 with the lower rail section 412 and the second material transportation system 417 exchange predetermined materials through the shared material transfer port 414. Thus, materials usually transferred by the first material transport system 409 with the lower rail section 412 can be efficiently transferred by the second material transportation system 417.

Peiter does not disclose or suggest that, "the first material transport subsystem transfers material within a production bay and **between at least two production bays**." Peiter thus fails to disclose or suggest the feature of Claims 1, 10 and 15. Peiter's intrabay rail track 20 cited as the first material transport system is **mounted along** the interbay rail track 10 **within the bay area** to reduce cycle times set forth in Peiter's description. Because the intrabay rail track 20 is confined within a single production bay area, Peiter's structure cannot achieve the feature in

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Claims 1, 10 and 15. There would have been no motivation for one skilled in the art to modify Peiter's structure to achieve the combinations of Claims 1, 10 and 15. Therefore, Claims 1, 10 and 15 would not have been obvious over Peiter.

Applicant's FIG. 3 cited by Examiner does not cure the deficiency of Peiter. The combination of Peiter and FIG. 3 fails to disclose or suggest that, "the first material transport subsystem transfers material within a production bay and **between at least two production bays**". Accordingly, Claims 1, 10 and 15 should be patentable, and the rejection under § 103(a) should be withdrawn.

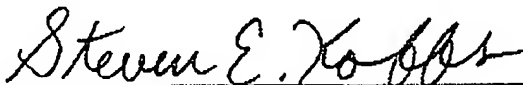
Claims 3-9 and 24 depend from Claim 1, Claims 11-14 depend from Claim 10, and Claims 17-23 depend from Claim 15. The dependent claims should all be allowable for at least the same reasons as the independent claims, respectively.

In view of the foregoing amendments and remarks, Applicant submits that this application is in condition for allowance. Early notification to that effect is respectfully requested.

The Commissioner for Patents is hereby authorized to charge any additional fees or credit any excess payment that may be associated with this communication to deposit account **04-1679**.

Respectfully submitted,

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